

# **EXHIBIT F**

Affidavit of Robert Cohen

**AFFIDAVIT**

My name is Robert Cohen and I am the founder of the Law Offices of Robert M. Cohen in Beverly Hills, California. My practice involves complex and high asset property distribution, child custody and divorce matters. I am a mediator and have served as a family law expert and taught as a law professor at Pepperdine Law School. I have also served as a Judge Pro Tem in both the Beverly Hills and Los Angeles Municipal Courts. I received my A.B. from Boston University and L.L.B from Boston University. I am licensed to practice law in California.

I met Vernon Maxwell when he was in the 12<sup>th</sup> grade of High School at Verbum Dei High School in Los Angeles in the late 1970s. He was an exceptional football talent, receiving an athletic scholarship to Arizona State University, where he excelled as a linebacker. During his time at Arizona State, Vernon Maxwell set school records for sacks which ultimately led him to be drafted as the first pick in the second round by the Baltimore Colts in the 1983 draft.

I was Vernon Maxwell's agent and advisor throughout his seven years in the NFL. His talent was recognized through the award of the NFL Defensive Rookie of the year. Vernon Maxwell was a leader on and off the football field through his actions and words.

I have remained a close adviser and friend of Vernon Maxwell over the years. Along with his former teammate, Broderick "Rick" Jones, they became intimately involved as advocates in the fight against the NFL relating to head trauma. They were both communicating with Alan Schwartz of the NY Times for years while he was investigating the NFL's hidden brain injury controversy.

They both educated themselves with the research surrounding the NFL's cover-up of concussions. They learned of other players' struggles with symptoms including memory loss, depression and anxiety which they shared in common. Over time, I became very impressed with Vernon Maxwell's understanding of the medical issues regarding causation of concussions and symptoms therefrom, and his concern regarding the number of players that appeared to have concussion symptoms.

They came to me around 2010 seeking advice on how to explore a legal case on their behalf involving the NFL's mismanagement of their long-term health when they played. On their behalf, I spoke with some prominent class action lawyers around the country. All of the lawyers advised me that they had reservations about the legal theories and the individually distinct nature of the injuries, claiming that the cases could not be brought as a class action.

In early 2011, Vernon Maxwell told me that he and Rick Jones were introduced to Jason Luckasevic, a young and highly skilled attorney, by Dr. Bennet Omalu. I was soon thereafter introduced to Jason Luckasevic by Vernon Maxwell. I learned of Jason Luckasevic's plans to

file a lawsuit on behalf of dozens of former players for the NFL's fraud and negligence to the former players on handling head injuries. No one was able to quite capture how football was causative of their later life cognitive and functional problems. But, Jason Luckasevic was able to do that based on his experience of having handled asbestos disease cases with similar latent injuries. I later learned that Jason Luckasevic had formed a team of powerful litigators, including Tom Girardi, with whom I am very familiar, as his office is in Los Angeles. Tom Girardi is a senior partner at one of Southern California's premier Plaintiff's Attorney law firms, and is one of the foremost trial attorneys not only in Southern California, but in the United States.

During those months, I worked with Jason Luckasevic, Vernon Maxwell and Rick Jones in the investigation of similarly injured former players whose claims were added to the Complaint drafted by Jason Luckasevic.

On July 19, 2011, they filed the first lawsuit seeking individual benefits for personal chronic brain injuries suffered by former players against the NFL and Riddell. That August, a second lawsuit was filed on behalf of many more dozens of players claiming similar injuries.

I can personally attest that during 2011, I spent between 300 and 500 hours working with Jason Luckasevic, Vernon Maxwell and Rick Jones to make this lawsuit a success reviewing the claims of injured former NFL players. I believe that after filing the first two lawsuits, it gained momentum due to the large number of former players filing suit and Jason Luckasevic's formidable litigation team.

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Ultimately, many lawyers copied Jason Luckasevic's Complaints to file lawsuit for their clients using his work. As I understand it from keeping track of the litigation, there have been no new legal claims or factual allegations advanced since the efforts of Jason Luckasevic and his original Complaints. Jason Luckasevic is a young litigator with a passion, idea, imagination and an undeterred effort to make this case a reality for the struggling former players. Most importantly, based upon my many conversations with Jason, Vernon and others, I believe that Mr. Luckasevic has integrity and is credible. But for Jason's efforts, there would never have been the "NFL Concussion Litigation."

Further this Affiant sayeth naught.

  
Robert M. Cohen  
Aug. 15<sup>th</sup> 20

## ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California  
County of Los Angeles

On August 15, 2016 before me, DEBORAH Anne Klinger, a Notary Public  
(Insert name and title of the officer) Public

personally appeared ROBERT M. COHEN  
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature Deborah Anne Klinger (Seal)

